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BY ECF AND EMAIL

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May 31, 2020

Hon. Dennis Montali  
United States Bankruptcy Judge  
450 Golden Gate Avenue, 16th Floor  
San Francisco, CA 94102

Re: In re PG&E, Case No. 19-30088: **OBJECTION TO REQUEST TO CROSS-EXAMINE**

Dear Judge Montali:

The Debtors object to the untimely and outrageous request filed this evening by Mr. Hallisey and Mr. Scarpulla seeking, for the first time, to cross-examine Mr. Ziman at tomorrow morning's hearing, and up to fifty minutes to do so.

By Order dated May 25, 2020 [DKT 7567] this Court advised all parties that at the hearing on May 26 "counsel desiring to examine any of these four witnesses will be asked to identify themselves, which witnesses they wish to question, and what are their time estimates." That hearing took place on the 26th and the only request Mr. Scarpulla made was to examine Ms. Pullo for 5-10 minutes and no requests were made by Mr. Hallisey. Notwithstanding that they had every opportunity to request time with the Debtors' other three witnesses, Mr. Scarpulla and Mr. Hallisey were silent. Their request, made without any prior notice to Debtors' counsel and literally on the eve of Mr. Ziman testifying, is untimely and should be rejected.

In addition, seeking up to fifty minutes to examine Mr. Ziman, whose testimony relates primarily to the sources of the Debtors' financing, is unreasonable on its face, especially given the timing of the request. The fifty minutes is more time than any party making a timely request has sought to cross-examine any witness at the hearing. For these reasons, the Debtors object to the request.

Respectfully Submitted,

*/s/ Theodore E. Tsekerides*

Theodore E. Tsekerides

cc: All counsel via ECF